Jim C (comm)

4/10

Libby CSS SAP Comments

Overall I think the document gets us the data we need and the approach is sound and consistent with my guidance However the writing was at times lacking In other words you got the who what where when & how fine but the why is lacking Most of my comments are editorial and get at more clearly detailing why we are doing what we are doing

1 Section 1 Page 1 1 5th paragraph, last sentence Rephrase The major concern with LAA is the content of asbestiform minerals of the richterite winchite tremolite/actinolite solution series Only a fraction of LAA is tremolite most is richterite and winchite

2 Section 1 Page 1-2 1st full paragraph Rephrase The results of the Phase I and Phase II investigations clearly show that LAA source materials when disturbed release significant amounts of respirable LAA fibers LAA sources may include primary sources such as zonolite attic insulation (ZAI) vermiculite products and waste and soils contaminated with greater than 1% LAA or secondary sources such as soil or dust that are contaminated with LAA Because LAA-containing vermiculite products have been used randomly at unknown properties in the past EPA has determined that each property in the Libby Valley requires screening for potential sources of LAA The CSS will use a combination of visual inspections verbal interviews and outdoor soil sampling to screen for the presence of potential sources of LAA in areas where exposure is most likely to occur

3 Section 1 1 Page 1-3 Rephrase The primary objective of this investigation is to determine the presence or absence of potential LAA sources at each property within the study area There are several secondary objectives including

- identification of properties requiring immediate cleanup (e g containing primary sources)
- identification of properties requiring further investigation, such as indoor dust sampling
- quantification of relative LAA abundance in soils (weight %)
- recording circumstances at specific properties which may serve to increase exposure or affect remediation
- examining data for spatial trends across the study area

The CSS results will support future risk-based investigation and remedial decisions on a property by property basis

4 Section 2 2 page 2-2 Typo – last sentences of incomplete paragraph at top of page are repeated in the 1st full paragraph just below

5 Section 2 2 page 2-2 last sentence 3rd full paragraph Should be were affected

6 Section 2 2 page 2-2 Last paragraph Rephrase Future work in Libby is proceeding to two fronts First ERB continues to remove previously identified "primary outdoor source areas and is also considering the removal of ZAI from buildings in the Libby Valley Second pursuant to the proposal of the Libby Asbestos Site to the National Priorities List (NPL) in February 2002 the EPA Superfund Remedial Program has initiated a Remedial Investigation (RI) of which the CSS is the first phase The CSS will identify additional properties containing primary sources which require immediate cleanup as well as identifying properties which may require further risk based investigation under the RI

7 Section 2 4 Page 2-3 1st paragraph last sentence Rephrase "Tremolite asbestos a form which is closely related with the amphibole asbestos in Libby vermiculite is considered by many to be the most toxic Also add additional text While some chrysotile asbestos is likely present in the study area, it is not due to site-related contamination and is not considered a contaminant of concern The CSS will not screen for chrysotile or other forms of asbestos – only LAA If other contaminants are discovered the property owner will be properly advised ' Also a third bullet should include regular lung cancer Even though this type of cancer is not specific to asbestos exposure it is caused by asbestos exposure

8 Section 3 1 Page 3-1 Rephrase this section The CSS will use a combination of visual inspections verbal interviews and outdoor soil sampling to identify both primary and secondary sources of LAA within the study area Screening and sampling will focus on areas where vermiculite products are most likely to be encountered (e g attic insulation garden soil amendments) and where disturbance/exposure is most likely to occur (e g near-surface soils as opposed to soil at depth) Results of the investigation will be used to classify properties (or portions of properties) within the study area with the following designations

- Property is clean (e g no indication of primary or secondary sources inside or outside)
- Property has primary sources of LAA and immediate cleanup activities may be conducted
- Property does not have primary sources of LAA but there are indications that secondary sources are or may be present Further investigation may be required to determine if cleanup activities are necessary

9 Section 3 2, Page 3-1 Delete 2nd sentence (Large commercial) Add language at end of paragraph The study area boundary may be adjusted as the extent of contamination becomes clearer Also specific properties with unique or complex circumstances (e g large or many buildings) may be addressed with modified sampling approach slightly different than the approach detailed in this SAP An addendum to the SAP will be prepared for such cases

10 Section 3 3 1 3 This section should be part of Section 3 3 2 Public Awareness It should be stated that EPA will solicit and welcome requests of special scenarios which may require priority scheduling and your description is how it will be handled

11 Section 3 3 3 Bullets Add a bullet for visual inspection

12 Section 3 3 3 1 and Section 3 3 3 2 I would like a separate section for visual inspection – as it is written inspection for ZAI is included under verbal interview and inspection for other source materials is included in soil sampling There should be (1) an interview section detailing information we can only get from asking (2) a visual inspection section detailing information we can get from seeing or can verify by seeing and (3) a soil sampling section, which looks for outdoor sources we can t see

13 Section 3 3 3 2 Page 3-6 The Segregate Land Use Areas discussion should refer again to Figure 3 2

14 Section 3 3 3 2 Page 3-7 last paragraph of Determine Sampling Locations It should be explained why the sample depths were chosen Relate it to the site conceptual model Mechanical disturbance (and hence release and exposure) to the 6 inch depth is likely in areas such as gardens or play areas (rototilling digging) whereas mechanical disturbance is only likely on the surface for grassy areas (mowing etc)

15 Section 3 3 4 1st sentence This is the first time the analytical methods are described but it is done so briefly and casually It should be clearer up front what the methods are what they can or can t do and why they were chosen Some hints IR is a an efficient presence/absence technique with a relatively low detection limit – that s what we are trying to do SEM is a less efficient presence/absence technique but has a much lower detection limit and allows some visual description of the fiber morphology

16 Section 3 4 – Rewrite as I said What could go wrong and what steps are we taking to make sure it doesn t

17 Section 5 1 – Does Volpe need a section? What are their roles and who are their people?

18 Section 5 4 1 DQO s – Needs redone poor

19 Sections 5 6 7 8 – QA/QC plan – needs redone as I said – what can go wrong